Frederic M. Wolfram THE WOLFRAM LAW FIRM, P.C. Chase Tower 600 S. Tyler St. Suite 1406 Amarillo, Texas 79101-2361 806-372-3449 Fax No. 806-372-3324 eric@wolframlaw.com

Attorneys for Arpan Bhakta and Manjula Bhakta, Parties in Interest

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

In Re:	*	
	*	
Krisu Hospitality, LLC	*	Case No. 2:19-bk-20347-rlj11
1	*	
	*	

## NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears on behalf of Arpan Bhakta and Manjula Bhakta, a party in interest and possible counterclaimant, creditor of Debtor, and hereby gives this notice of appearance in the above-captioned proceeding and requests notice of all hearings and conferences herein and make its demand for service of all papers herein including all papers and notice pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010 and §342 and §1109(b) (if applicable) of the Bankruptcy Code. All notices given or required to be given in this case and all papers served or required to be served in this case shall be given to and served upon the undersigned at the following office address and telephone number. This notice of appearance is not a waiver of any right to challenge the eligibility of the Debtor for relief under the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and Sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleading or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed with or delivery to the Bankruptcy Clerk, Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above referenced bankruptcy case and any proceedings related thereto.

Dated November 11, 2019

Respectfully submitted,

THE WOLFRAM LAW FIRM, P.C. Chase Tower 600 S. Tyler St. **Suite 1406** Amarillo, Texas 79101-2361 806-372-3449 Fax No. 806-372-3324 eric@wolframlaw.com

Frederic M. Wolfram

Texas Bar I.D. No. 21869900

Colorado Bar I.D. No. 48867

ATTORNEYS FOR ARPAN BHAKTA AND MANJULA **BHAKTA** 

## **CERTIFICATE OF SERVICE**

I, Frederic M. Wolfram, do hereby certify that on November 11, 2019, the date of filing of this instrument, the above and foregoing was sent to all parties entitled to same, including the following, electronically under the ECF filing system.

Krisu Hospitality, LLC, Debtor in Possession

500 W. Harvester Pampa, TX 79065 United States Trustee Northern District of Texas 1100 Commerce Street

**Room 976** 

Dallas, TX 75202

Patrick Alan Swindell, Attorney for DIP

Swindell Law Firm 106 SW 7th Ave. Amarillo, TX 79101 Internal Revenue Service Special Procedures—Insolvency PO Box 7346

Philadelphia, PA 19101-7346

Date: November 11, 2019

Frederic M. Wolfram